

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

EDMAR FINANCIAL COMPANY, LLC, and IRISH
BLUE & GOLD, INC.,

Plaintiffs,

Case No. 1:21-cv-6598

vs.

CURRENEX, INC., GOLDMAN SACHS & CO.
LLC, HC TECHNOLOGIES, LLC, STATE STREET
BANK AND TRUST COMPANY, and JOHN DOE
DEFENDANTS 1-5,

Defendants.

**JOINT STIPULATION AND [PROPOSED] ORDER RE: SCHEDULE FOR FILING
THE AMENDED COMPLAINT AND MEMORANDA OF LAW REGARDING
MOTION TO DISMISS**

1. WHEREAS, on August 4, 2021, Plaintiffs Edmar Financial Company, LLC and Irish Blue & Gold, Inc. (together, “Plaintiffs”) filed their class action complaint (Dkt. No. 1) against Defendants Currenex, Inc., Goldman Sachs & Co. LLC, HC Technologies, LLC, State Street Bank and Trust Company, and John Doe Defendants 1-5 (collectively, “Defendants”);

2. WHEREAS, on August 25, 2021, the Court ordered—pursuant to the parties’ stipulation—that Defendants were to file their motion to dismiss by October 13, 2021, and that Plaintiffs had the option to elect to amend the Complaint by November 12, 2021, and then to meet and confer in good faith with regard to a new schedule (Dkt. No. 14); and

3. WHEREAS, on October 13, 2021, Defendants filed their motion to dismiss (Dkt. No. 33); and

4. WHEREAS, Plaintiffs exercised their option to elect to amend the Complaint on November 12, 2021, and the parties met and conferred regarding a new schedule.

NOW, THEREFORE, IT IS HEREBY ORDERED:

1. Plaintiffs must file their amended complaint by January 6, 2022.
2. Defendants must file any motions to dismiss by February 25, 2022.
3. Plaintiffs must file their oppositions to any motions to dismiss by April 8, 2022.
4. Defendants must file their reply to Plaintiffs' opposition by May 6, 2022.
5. Nothing in this stipulation prevents any party from seeking further extensions on the consent of the parties or from the Court.
6. Nothing in this order is intended to curtail the rights under the Federal Rules that might otherwise exist absent this agreement.

IT IS SO ORDERED.

DATED: _____

THE HONORABLE LEWIS A. KAPLAN
UNITED STATES DISTRICT JUDGE

DATED: New York, New York
November 18, 2021

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